

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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CONSTANTINE ANGELOPOULOS, :

Plaintiff, : Civil Action No.

-v- : 2:19-cv-01578

HDR ENGINEERING, INC., :

Defendant. :

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Deposition of HDR ENGINEERING, INC., by its designee

RICHARD G. ATOULIKIAN

Pittsburgh, Pennsylvania

Thursday, October 29, 2020

9:30 a.m.

Job No.: 330967

Pages: 1 - 126

Reported by: Keith G. Shreckengast, RPR

Transcript of Richard G. Atoulikian, Corporate Designee
Conducted on October 29, 2020

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1 HDR, and the person involved is David Watson. Do
2 you see that?

3 A Where is the April 13th? Is it on the
4 first tab that you provided?

5 MS. RODRIGUEZ: I think it's the third
6 tab. Are you talking about the top?

7 Q It's the top middle.

8 A April 30th, 2015.

9 Q Yes. Do you see that that's a Personnel
10 Action Form from HDR?

11 A Yes.

12 Q And the subject matter is David Watson.
13 Do you see that in the second box, where it says
14 name?

15 A Yes.

16 Q Okay. It also says nature of the action,
17 it says new hire. Am I correct in saying that HDR
18 hired Mr. Watson on or about April 30th, 2015?

19 A That is correct.

20 Q One of the next pages should be also
21 tabbed, is dated December 27th, 2015, also involving
22 Mr. David Watson?

23 A That is correct.

24 Q So you have that in front of you?

25 A I do.

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1 Q Okay. Do you see the nature of the
2 action is labeled transfer? There's an X by
3 transfer.

4 A Yes. Yes.

5 Q Would you agree that that represents the
6 fact that Mr. Watson was transferred at that time?

7 A Correct.

8 Q And could you tell us where he was
9 transferred from, and where he was transferred to?

10 A Sure. So at the time David Watson was
11 hired -- so let me take one step back. So HDR is
12 organized by, at the time it was called departments.
13 So the department that I was in included Pittsburgh,
14 West Virginia, and northeast Ohio. And there was a
15 department that included Kentucky, Tennessee, and
16 central and southwest Ohio. So David Watson was
17 hired by the Kentucky, Tennessee, central southwest
18 Ohio department, which is the Lexington department,
19 I'll refer to, in April of 2015.

20 Q Okay, great.

21 A And he was transferred through -- it was
22 a corporate decision to bring the two Ohio portions
23 of the departments into Pennsylvania, West Virginia,
24 and Ohio as one, as part of that department, in
25 December of 2015.

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1 Q Okay. Was -- did anyone from the
2 Kentucky, the Lexington, Kentucky branch, actually
3 move?

4 A No. It was the people that sat in
5 Columbus and Cincinnati, in the water group, that
6 became part of our Ohio, Pennsylvania, West
7 Virginia, water group.

8 Q Okay.

9 A Nobody moved. Physically moved.

10 Q And prior to this company move that you
11 described, you recognize that, I'll call him
12 Constantine, that's my client, Mr. Angelopoulos, but
13 to make it easier we'll just call him Constantine,
14 he was previously in the Pittsburgh water group,
15 correct?

16 A At the time of the transfer, yes, he was
17 in the Pittsburgh water group. He was hired as an
18 industrial -- in the industrial group.

19 Q And at the time of this transfer -- prior
20 to this transfer, Mr. Constantine -- or Constantine
21 was the only electrical engineer in that Pittsburgh
22 water group; is that correct?

23 A That is correct.

24 Q And that had been the case for many years
25 prior to that, correct?

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1 A Well, define many.

2 Q At least five.

3 A Let me make sure I have the dates right
4 in my head. So Dino was hired in 2006 as an
5 industrial engineer. And I think the answer is no,
6 he was not in the water group for five years. He
7 was in the water group for less than five years.
8 And so in the industrial group, when the leadership
9 of that group left HDR and took their clients with
10 them, we brought Dino into the water group, which I
11 think was probably around 2014, 2015 or so, if I
12 remember correctly.

13 Q So he was the only electrical engineer in
14 that Pittsburgh water group?

15 A Correct.

16 Q Do you know whether, prior to bringing
17 him into the water group, whether he was the only
18 electrical engineer in that Pittsburgh group, in
19 total, upon his hire, to the point he was
20 transferred to the water group?

21 A I believe, yes. I don't think there were
22 any electrical engineers in our transportation group
23 at the time.

24 Q So is it -- and we know that Mr. Watson
25 is an electrical engineer as well, correct?

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1 A Mr. Watson is an electrical engineer,
2 that's correct.

3 Q So at the time of HDR's transfer as per
4 that personnel action form dated December 27th,
5 2015, there became two electrical engineers in the
6 Pittsburgh group, namely Mr. Watson, in addition to
7 the previously existing Constantine, correct?

8 A That is correct.

9 Q And no other electrical engineers were
10 transferred to that group; is that correct?

11 A That is correct.

12 Q Now Mr. Watson had always lived in
13 Columbus, though; is that correct?

14 A When he was -- he was hired, yes. He was
15 hired in Columbus. To my knowledge, he's always
16 lived in the Columbus area. And that caveat is,
17 David was in the service, and he was stationed, I
18 think in other places. But when he was hired into
19 HDR, he lived in the Columbus area, and still does.

20 Q So just so I'm clear, correct me if I'm
21 wrong, at the time of this company decision to
22 consolidate, or I might be using the wrong term, but
23 to bring in additional locations of HDR engineers
24 into the Pittsburgh group, there would have been
25 others involved as well, as opposed to just Mr.

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1 Watson?

2 A That is correct. We had water group
3 staff in Columbus, in addition to Mr. Watson, and
4 also in Cincinnati.

5 Q Were you involved in that decision
6 making?

7 A No. That decision was made as a -- by
8 our executive leadership, to bring those two
9 departments together on the water group side.

10 Q What's your understanding of why that was
11 done?

12 A I think for a couple of reasons. Number
13 one is to be consistent with our transportation
14 organization, which Ohio has always -- well, I
15 shouldn't say always -- Ohio has been one group
16 since I started with HDR, I think actually since
17 it's been formed, so consistency from that
18 standpoint, and also from a business standpoint, in
19 order to leverage resources across our area, it
20 didn't make sense from a reporting standpoint to
21 have two different departments split Ohio.

22 Q And we know Mr. Watson wasn't stationed
23 in Lexington, Kentucky, right?

24 A He reported to Lexington, but he was
25 stationed in Columbus, that's correct.

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1 Q Okay. And he -- just months after his
2 hire, he was transferred, correct?

3 A With other folks, yes.

4 Q Right.

5 A Yeah, probably what, eight or nine
6 months, April to December.

7 Q What work, if any, did he bring with him
8 from the Lexington group?

9 A Yeah, so David worked on a -- when he
10 came on board, he worked on a number of projects.
11 And I don't have the list memorized. We can
12 certainly get it for you.

13 Q Well, I have some documents. I just want
14 to know --

15 A Yeah, his work was principally on
16 projects that we had, HDR had in Kentucky, and in
17 the Columbus, Cincinnati area.

18 Q Who do you recall generating that work
19 for Mr. Watson; he, himself, or the company?

20 A I would imagine that it was a combination
21 of both, that it was the area leadership on the
22 water side, which was Brent Tippey, and Larry
23 Anderson. They were the ones that generated the
24 work. And David was involved in the winning of the
25 work, and then delivery of the work.

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1 Q But he was only there for a couple months
2 as a new hire before he was transferred?

3 A Yeah, more than -- I mean define couple.
4 But it was April to December. So what is that,
5 about eight months.

6 Q Right, yeah. So did he develop his own
7 clientele during that short time period?

8 A Well, so David had worked in the industry
9 previous to joining HDR, also in the Columbus area.
10 And so through his other employer, you know, he
11 worked for clients in the area that knew him. And
12 so he had a reputation, a good reputation, with
13 those clients.

14 Q In that packet I provided -- is there an
15 orange tab somewhere on there?

16 A Yeah.

17 Q I want you to turn to that.

18 MS. RODRIGUEZ: John, I assume this is
19 what we produced in discovery?

20 MR. ADAMCZYK: Yes.

21 Q There's a document identified as a
22 project summary, it's called Watson Angelopoulos
23 2015 - 2018 Project Summary. I believe it's a
24 compilation of what you or your counsel did. It's a
25 two page document you have in front of you?

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1 Q Okay.

2 A So in our business, you typically will
3 charge to either a project, or overhead, which can't
4 be billed, or marketing, which is, you know,
5 marketing, it's an investment to try to win a
6 project. And then there's I mean PTO, obviously.
7 But those are the general three buckets.

8 Q In looking at this document, I think I
9 highlighted it for you, but there's a job project
10 that both work -- looks like both worked on, but
11 you'll correct me if I'm wrong, called the NEORS --

12 A Second stage lift station improvements,
13 S2LS?

14 Q Yes.

15 A Correct.

16 Q Do you agree that both individuals, both
17 Mr. Watson and Dino, have hours worked on that
18 project?

19 A I agree.

20 Q Dino refers to this as the Cleveland
21 project. Was it located in Cleveland?

22 A Yes, a suburb of Cleveland.

23 Q Had Dino worked on this project prior to
24 Mr. Watson being transferred to the Pittsburgh
25 group?

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1 A So we were selected for that project, and
2 I was the one that led the marketing of that. And I
3 was the project manager on that project. We were
4 selected for that project in the spring of 2015, I
5 believe right before David started with us. And the
6 project was delineated into a preliminary
7 engineering phase, and then a detailed design phase.
8 And so during the preliminary engineering phase,
9 which went from the first quarter of 2015, basically
10 through the end of the year, Dino was our lead
11 electrical engineer on that project. And
12 preliminary designs were the decisions are made as
13 to what the path forward would be. And so yes, Dino
14 led that project up -- pretty much completely until
15 we finished the preliminary design phase in about
16 December of 2015. And then a project moves into
17 detailed design after that. That's just the process
18 that this client uses.

19 Q How was it that -- who gave the
20 instructions for Mr. Watson to be involved on that
21 project?

22 A So on that project I was project manager.
23 And, you know, in our industry the project manager
24 is responsible for the successful delivery of the
25 project, meeting the clients, scope, budget,

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1 schedule. So as we went through the preliminary
2 design phase, the scope of the electrical work
3 increased significantly.

4 And again, that was Dino was leading that
5 work for us. So as we completed the preliminary
6 design phase, I made the decision as project
7 manager, and based on at the time 40-plus years of
8 experience in the industry, that in order to get
9 that project done within the client's schedule, that
10 we needed an additional electrical resource. And
11 that was identified as David Watson.

12 Q Was that contemplated upon Mr. Watson's
13 transfer?

14 A That was contemplated as we finished the
15 preliminary design. And as I said, the scope of the
16 work, the electrical work, increased significantly
17 during that preliminary design. So it had nothing
18 to do -- it was coincidence that the two things
19 happened at the same time.

20 Q So in looking at that document, and
21 especially on -- I see that during this time frame
22 that we're talking about, Mr. Watson put in 399.5
23 hours, and Mr. -- or Dino put in --

24 A It's 500 and something.

25 Q 589?

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1 A Yes.

2 Q Is that correct?

3 A Yes.

4 Q So go to the second page. The last
5 column says total overhead hours. Total overhead
6 hours on that page suggest that Dino's was 1,691,
7 and Mr. Watson's was 720, correct?

8 A Correct. That's what it says, that's
9 correct.

10 Q And correct me if I'm wrong, but overhead
11 hours are not something that you want, correct?

12 A That is correct.

13 Q And again, I think I know why, but why
14 don't you tell us why.

15 A Tell you why overhead hours are not
16 something that we want?

17 Q Yes.

18 A To clarify? Sure. Well, you know, as in
19 any business, when you charge to overhead, and as I
20 mentioned before, I mean there's one bucket that's
21 general overhead, there's another one that's PTO,
22 personal time off, which is earned. When you charge
23 to overhead, it comes directly off of the bottom
24 line of the company, because it can't be billed to
25 clients. It's not an investment in trying to win

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1 new work. So that's why it's not desired.

2 Q It's not profitable, in other words?

3 A Correct.

4 Q So if -- so assuming that we did not have
5 Mr. Watson work on this project, but just Dino,
6 their numbers would pretty much even out as far as
7 their unproductivity, correct? You do the math.

8 A Well, again, you know, the driving force
9 here was the client's schedule, so --

10 Q That's not my question, though, sir.

11 A Tell me the question again, please.

12 Q My question is, if you took the hours
13 that Mr. Watson charged, and forwarded them to Dino,
14 then by virtue of that, Dino's unproductive hours
15 would have went down substantially, because he would
16 have worked on the project, and Mr. Watson's would
17 have went up correspondingly, correct?

18 A For the overall time period that goes
19 beyond the duration of the project.

20 Q Yes.

21 A For the time period from June of 2016
22 to -- I'm sorry, to March of 2018. But the project
23 was a subset of that time frame.

24 Q Right. And by my math, the total
25 overhead hours would have went -- if, indeed, Dino

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1 was allowed to work on that by himself, his
2 non-chargeable overheard hours would have been
3 1,292, and Watson's would have been 1,011, correct?

4 A On a math basis, that's correct. But
5 that would not have gotten the project done within
6 the time frame that the client directed us to get it
7 done within. So if you just do pure math, your
8 numbers -- I didn't check your numbers, but on a
9 pure math basis your numbers would be correct. But
10 again, the project was at the client schedule.

11 Q I didn't see any documents which
12 described what you're describing to me now, and that
13 you -- the rationale and the reasoning for you
14 having selected Mr. Watson to share the work with
15 Dino. Does anything exist in that? Did you write
16 something, did you send it to someone for approval?

17 A So the way that that happened is in --
18 you know, I would have to look and see if there's
19 any written documents to that. So the way that that
20 happened, is, as we finished the preliminary design
21 phase, I talked to Dino. Again, I'm the project
22 manager. You know, I'm responsible for the
23 successful delivery of the project. I talked to
24 Dino and I said the scope of this project has grown
25 significantly. And I -- it's my opinion that we

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1 cannot get the project done with only one electrical
2 engineer on it, that we need to add a second
3 electrical engineer. And he did not disagree. It
4 was a collaborative decision. So I asked Dino, I
5 said would you talk to David Watson, and you two
6 figure out what makes the most sense from a work
7 sharing standpoint, so you're not stepping on each
8 other's toes, but you're working in collaboration.
9 And so they did.

10 Q But this was a time when Dino's hours had
11 not been reduced, correct?

12 A That is correct. But Dino also had work
13 from other places as well. You know, this wasn't
14 Dino's only project.

15 Q I understand that.

16 A Or David's, for that matter.

17 Q Do you agree or disagree that Dino's
18 hours worked on billable time was -- that he was in
19 need at this point in time of more workable hours at
20 the time the transfer between -- at the time that
21 Mr. Watson started working on the Erie project?

22 MS. RODRIGUEZ: I'm sorry, what -- I just
23 want to make sure the record is clear. It's not an
24 Erie project, I think it's Cleveland.

25 MR. ADAMCZYK: I'm sorry, you're right.

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1 need more hours, billable time, at that juncture?

2 A My recollection from looking at the data
3 is Mr. Watson's utilization or billable time has
4 been generally pretty consistent in his time with
5 HDR, in being very close to or exceeding his goal.

6 Q So by virtue of that statement, he didn't
7 necessarily need the hours to be in HDR's good
8 graces, but Dino did at that point in time?

9 A Again, it was a decision based on
10 delivering the project within the schedule. So
11 while utilization is important, delivering the --
12 any of our projects within our client's
13 expectations, in my opinion, you know, is the
14 overriding factor to how you staff a project.

15 MR. ADAMCZYK: Can you read back that
16 question for me, because I would like an answer.

17 (The record was read back by the
18 Reporter.)

19 Q That's a yes or no question.

20 A Well, I mean personally I don't like the
21 term good graces. So can you rephrase the question
22 for me.

23 Q Sure. At the time when you asked the
24 project in Cleveland to be shared between Dino and
25 Watson, Watson -- you agree with me that Watson was

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1 year. Because we converted into a new system, and
2 the information before that is lost. So during the
3 time frame when we were doing the second stage lift
4 station, which is mostly 2016, Dino was at
5 82 percent. His goal was 85 percent. And David was
6 at 97 percent, and his goal was at 90 percent. So
7 no, actually Dino was pretty busy during that time
8 frame when this project was in detailed design. So
9 it does change my answer to no, Dino was not light,
10 he was busy.

11 Q Well, you'll agree with me by virtue of
12 this document, that Dino's production in 2017 went
13 down substantially, correct?

14 A Yes. His utilization over 2017 was
15 42 percent, according to this report.

16 Q And that's not acceptable, is it?

17 A His goal was 85 percent. So that is,
18 yes -- he was significantly less, underneath his
19 goal.

20 Q And this Cleveland project lasted from
21 when to when?

22 A So the detailed design of that went from
23 about January of 2016, probably -- I mean let me
24 check that, but probably for 12 months or so. And
25 then what happens as the project goes to bid, you

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1 A He was. But this included the time that
2 he was working on the second stage lift station
3 project for NEORSD.

4 Q And he remained busy, according to these
5 summaries, in 2017, at the 87.2 percent,
6 utilization?

7 A Yes, that's what the numbers show.

8 Q And even better at 95 percent in 2018?

9 A Yes.

10 Q At a time when, during these years where
11 Dino's utilization was reduced?

12 A Yes. Because David was hired, David was
13 originally hired, as we've talked about, to support
14 the Lexington team. And he was hired as a
15 replacement for another electrical engineer that had
16 left HDR and currently works for a client. So there
17 was plenty of work to support David in the Columbus
18 area, Cincinnati area, Kentucky and Tennessee. He
19 had clients, and he had projects that he had been
20 working on and continued to work on.

21 Q Let's look at that -- again referring
22 back to that summary.

23 A This one, or the one that you --

24 Q The first one.

25 A Okay, sure.

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1 Q Which projects did Watson work on that
2 were brought over from his short amount of time at
3 the Lexington office? I mean there's a whole list
4 of projects, but there's -- seems like there's very
5 few that were actually billed on, right? Am I
6 reading that right? If there's no numbers next to
7 it, that means they didn't work on it?

8 A That's what I would assume, that's
9 correct.

10 Q Okay. Assuming that we have very few to
11 look at here, there is -- well, I'll just let you go
12 through it.

13 A Yeah, I think I would like to look at
14 this list in a little more detail, because it
15 doesn't seem -- it seems to me that there are other
16 projects that don't appear to be on this list.

17 Q Did you help formulate this list?

18 A No.

19 Q Do you know who did?

20 A I believe it came out of our accounting
21 system by somebody in Pittsburgh.

22 Q Okay. Do you know projects that are not
23 referenced on here?

24 A Well, I mean I guess intuitively, you
25 know, from this sheet, David was very busy. But

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1 Q I remember, okay. And then lastly, what
2 we referenced before, the -- there's the Cleveland
3 project in addition to that?

4 A Second stage lift station, yes, that's
5 correct.

6 Q Which is again identified as NEOR- --

7 A SD.

8 Q SD, okay. Out of these projects that
9 both worked on, were you in charge of assigning both
10 engineers, Watson and Dino, to these projects?

11 A The only -- let me just doublecheck. The
12 only projects that I was responsible for in a
13 project role were the BEC Marion Water Treatment
14 Plant project that both worked on. The second --
15 NEORSD S2LS Improvements project. Those were the
16 only two projects. So -- go on, sorry.

17 Q Of any of these projects, did they come
18 with Watson from Kentucky?

19 A The Marion project was Marion is in the
20 Columbus area, and so that project was assigned to
21 David, because it was in the Columbus area, as our
22 lead electrical. And Dino was brought on to do
23 quality control reviews, which is why David had more
24 hours on that than Dino did. And then the ARC Flash
25 project, which we talked about is a pursuit, is in

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1 the Columbus area. And David was leading that, and
2 he needed technical support from Dino.

3 Q So these were prior -- Watson was working
4 on this prior to his transfer, or they were assigned
5 after his transfer?

6 A Yeah, I think Marion we got selected for
7 that right before his transfer. And ARC Flash, I
8 believe we pursued that project after his transfer.

9 Q And both of those -- both the Marion and
10 ARC Flash, were assigned primarily to Watson as the
11 lead engineer, electrical engineer?

12 A Right. Because of experience and
13 proximity, and knowledge of the client.

14 Q What knowledge did he have of these
15 clients?

16 A Well, I mean David has spent most of his
17 professional career working in Columbus. So he
18 knows how Columbus DOSD, Department of Sewers &
19 Drains, he knows their facilities, their waste water
20 treatment facilities. He knows how they approach
21 the work, and what their standards are.

22 Q Did you make any effort over the time
23 period beginning when Watson was transferred to have
24 Dino share work on Watson's projects?

25 A I did.

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1 Q Specifically what did you do?

2 A So -- and if you look at the details in
3 the numbers here, I engaged Dino to the tune of
4 about 1,000 hours, just less than 1,000 hours to
5 support work that we were doing in Ohio. And that
6 includes the second stage lift station project that
7 he was involved with. I also, when we were pursuing
8 the ARC Flash project in Columbus, I asked David to
9 get Dino engaged in that, to help us review all the
10 background information that we needed to, to put
11 together a solid proposal. Those are two examples.

12 Q But the 1,000 hours that you just
13 mentioned to support Ohio, that also included the
14 Cleveland project, right?

15 A That's correct.

16 Q So that was Dino's before, right?

17 A Dino was a lead engineer on the
18 preliminary engineering phase, yes.

19 Q Right. So there was no trying to get him
20 hours -- to share hours with Watson on that, because
21 he was the lead engineer?

22 A Right.

23 Q So if you take out the 589 hours that
24 Dino was the lead engineer on the Cleveland project,
25 your statement that you tried to get Dino 1,000

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1 A So, much of Dino's career with HDR, he
2 was hired in the industrial department to do
3 electrical engineering for industrial clients.
4 David has spent most of his career working for
5 municipal clients. And so the difference is, on the
6 industrial -- on the municipal side, much detail has
7 to be provided in the construction documents because
8 it's open to anybody that's qualified to bid. It's
9 a public bidding in other words.

10 On the industrial side, typically,
11 industries have contractors that they usually work
12 with, that know how they do things, so the level of
13 detail is less. So while they're both electrical
14 engineers, the type of work and the product can be
15 different.

16 Again, David, you know, spent his career
17 on the municipal side. And our water group focuses
18 mostly on municipal clients. Dino's background is
19 industrial. So we did try to use him where we
20 could, you know, on the Mary Street Pump Station
21 project, which is one of the ones not on the common
22 list, but on Dino's list. I was project manager on
23 that. I led the winning of that project. And I
24 brought Dino onto that project as my lead electrical
25 engineer. Even though -- not even though, but it's

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1 A No, that's not correct. So, yeah, just
2 to put a little timeline together, so I joined HDR
3 in May of 2011. We had no presence in northeast
4 Ohio. I started that office. We did have a water
5 group in Columbus, and in Cincinnati. And in
6 talking to Larry Anderson and Brent Tippey, you
7 know, who were responsible for that Lexington group
8 that included Columbus and Cincinnati, Dino did not
9 work on any Ohio projects for them. When I was -- I
10 was hired to build a presence in northeast Ohio.
11 You know, the first opportunity that we got selected
12 for was a small one, to provide an electrical
13 engineer to sit in on a value engineering project.
14 And so I asked Dino if he would do that, and E did.
15 And then the next opportunity that we got
16 selected for where we needed internal electrical
17 resources was the Mary Street Pump Station that we
18 got selected for in I want to say like we started up
19 in the beginning of 2014. And Dino was my lead
20 electrical engineer on that, and did all the work,
21 other than having Larry Anderson do the quality
22 review on that, and seal it. So yeah, I mean there
23 were two projects that Dino got involved with in
24 northeast Ohio during that time frame. And I was
25 intimately involved in both of them.

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1 Q He had projects out of Columbus, though?

2 A That was the Lexington group. And again,
3 when I talked to Brent Tippey, who led that group at
4 the time, and Larry Anderson, who was our chief
5 electrical engineer in that group, both based in
6 Lexington, Dino did not help them on any projects
7 during that time period, before we came together.

8 Q Okay. Let's turn to those spreadsheets
9 again that we put aside for a second.

10 MS. RODRIGUEZ: The really detailed ones?

11 MR. ADAMCZYK: Yeah. I think the blue
12 tab for Watson.

13 Q Do you have that in front of you, sir?

14 A Yes.

15 Q Just for the record, tell me what this
16 is.

17 A So, yes, this is a spreadsheet that shows
18 David Watson's hours by project or activity, and by
19 week, from June of 2016 through, I believe -- let me
20 check -- December of 2018.

21 Q And again, this, just like the summary,
22 if there's no hours posted to it, that means that it
23 wasn't worked, right? In other words, there's many
24 projects listed, but unless there's hours listed,
25 they're not being worked on?

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1 category we're under? New work for Watson upon
2 transfer.

3 MS. RODRIGUEZ: So December 2015 forward?

4 MR. ADAMCZYK: Yes, right.

5 A And again, we only have records for June
6 of 2016 forward, so that's what I'm relying on. The
7 Athens US50 Waste Water Improvements project, again,
8 we don't have records before June of 2016. But I
9 believe he worked on that project. That project was
10 going on for awhile. And he charged time to that in
11 August of 2016 and beyond. The Automation program
12 for Northeast Ohio Regional Sewer District that's
13 called here 1381 Automation program, he charged some
14 time on that in June. September, October,
15 supporting our Columbus team on that. Columbus Task
16 16-BS O&M, Ready Services, he charged a little bit
17 of time to that in February of '17.

18 Q Let me stop you there for one second.
19 Who supported the Columbus team with electrical
20 engineering work prior to 2016?

21 A Prior to David coming, joining us, or --

22 Q Yes.

23 A Larry Anderson is our chief electrical
24 engineer in that group. Larry sits in Lexington.
25 And Larry has always had several electrical

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1 engineers and CAD drafting folks reporting to him in
2 that group. And he had one individual in
3 Louisville, Darryl Evans, that left HDR. And that
4 opened up the position that they ultimately filled
5 with David Watson. So Larry Anderson oversees that
6 group, and still does.

7 Q Who left that David Watson took his
8 place?

9 A Darryl Evans.

10 Q Okay. If you could go back to what you
11 were doing. Thank you.

12 A There's a project called D-WM Petrolia
13 Landfill Forcemain project that David charged time
14 to in January, starting in January of 2017. So that
15 would have been a project that looks like it started
16 after we came together.

17 Q Where was that located?

18 A I believe that's in Illinois. I think
19 the next one started after Dino resigned, just
20 checking. There's the Louisville MSD LMSD Rowan
21 Pump Station, R-O-W-A-N, Pump Station, in
22 Louisville, that started in May of 2017, that David
23 had worked on. There's the Columbus Zoo Potable
24 Water Storage Tank Design that David started
25 charging time to, working on in January of '17.

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1 Q Did you say Zoo?

2 A Zoo, yeah. Literally the Zoo.

3 Q And when was that?

4 A It looks like he first started working
5 on -- let me just check real quick. So it looks
6 like he first started working on that in January of
7 2017. He had a couple hours charged to the PDT,
8 which I think is Pennsylvania Department of
9 Transportation project, in January of '17. Which I
10 think we said was one of the projects that Dino also
11 worked on. So David had charged 2 hours to that.
12 So I'm guessing that, you know, we have a quality
13 process that somebody does the work, and somebody
14 reviews it, that those two hours were probably David
15 reviewing Dino's work. They did that back and forth
16 together. So David worked, starting in January of
17 '17 on the Chattanooga, Tennessee BED IM WWTP
18 Gravity. WWTP is waste water treatment plant in our
19 vernacular. Starting, I said, at the end of
20 January, he had a couple hours. He had some hours
21 in February 2017, and into March of 2017.

22 There is the URS Delaware County OECC
23 MCC, which is Motor Control Center, Upgrades,
24 Delaware County, again, is just north of Columbus.
25 URS is another firm, we were a subconsultant to that

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1 Q Let me stop you there for a second. How
2 is it that Watson gets an Iowa project, and Dino
3 does not?

4 A It's probably relationships. The project
5 manager reached out, either directly to Dino,
6 because she's worked with him before, or she reached
7 out to somebody that she knows that recommended --
8 not Dino, I'm sorry, Watson, recommended Watson.

9 Q I mean we don't know that, but you're
10 assuming that?

11 A I'm assuming that, yeah. Yeah. I was
12 not part of that decision or discussion. Because a
13 lot of times, I mean when you have senior folks, a
14 lot of times they have their own network. Dino had
15 his own network with HDR, that would give him work
16 when, you know, when there was work available, and
17 so did Watson.

18 Q Is there someone up above that takes in
19 the projects for HDR and distributes them?

20 A On larger projects, like the Second Stage
21 Lift Station, it would be the project manager, which
22 was me. But on a lot of these things, you know,
23 hey, I need a couple hours of Dino's time, or I need
24 a couple hours of David Watson's time to review
25 something. They just reach out. We're talking a

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1 Q So who were the claim managers for the
2 Pittsburgh group from 2016 through 2018?

3 A Right, so for Alcosan, it was -- first it
4 was Kim Kennedy, with Mike Crall. And then when Kim
5 left to go to Alcosan, it was Meredith Welle with
6 Mike Crall. And, you know, for PWSA at that time,
7 it was the same.

8 Q So at the time when the reorganization
9 took place, and Watson came in to the Pittsburgh
10 group, who were his client managers?

11 A Well, so in Columbus at the time, it was
12 Jennifer Frommer. In Cincinnati it was Michelle
13 Iannicca, I-A-N-N-I-C-C-A. Her name is in the list.
14 And in Kentucky it was Brent Tippey, for most of
15 Kentucky, with help from Mike Rudisell,
16 R-U-D-I-S-E-L-L, in Louisville. And in Tennessee,
17 it was, still is, Justin Bolanger, B-O-L-A-N-G-E-R.

18 Q You being in that position as well, are
19 you -- do you know if there's any coordination of
20 different client managers to keep your engineers
21 chargeable?

22 A Yeah, I mean we have had, and continue to
23 have, conference call every two weeks with our water
24 section leads, some of whom are client managers, to
25 talk about utilization. Who is light, who is, you

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1 know, overcommitted, what's coming up on the
2 horizon, to make sure that we've adequately staffed
3 each one of our projects.

4 Q Were you done with looking at that?

5 A No. Should I continue?

6 Q Yeah.

7 A So some of these are pursuits. Do you
8 want me to go through the pursuits?

9 Q Pursuits, define that for me.

10 A Marketing, projects we were marketing. I
11 can tell from the project managers are marketing
12 coordinators, so those are projects we were
13 marketing. And --

14 Q No, I don't think so, but let me ask you
15 a question about that. How would an engineer such
16 as Watson or Dino be involved in marketing? Would
17 that be something they do their own, someone would
18 ask them, how does that work?

19 A Yeah, so usually as an electrical
20 engineer, unless it's an electrical project, an ARC
21 Flash, the one we talked about before, is an
22 electrical project, the electrical engineers will
23 typically support the client manager and whoever
24 we've identified as the project manager, in terms of
25 meeting with the client to do, you know,

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1 Jennifer Frommer, who is our client manager for the
2 City of Columbus, you know, there was a lot of
3 investigative work that needed to be done as we
4 developed our proposal. And I asked Dino to work
5 with David to put that one together.

6 Just, I'm kind of thinking, so across
7 Pennsylvania, you know, one of the projects you'll
8 note that Dino worked on was an energy audit that we
9 did in Harrisburg for Capital Region Water, Dino was
10 not part of the marketing in that, but I did get him
11 engaged in the execution of that, the delivery of
12 that I should say.

13 Same thing with Delcora is another
14 project that you'll see on Dino's list, which is
15 Suburban Philadelphia. Delaware County, basically,
16 Pennsylvania. Dino provided technical work on the
17 pump stations that we were evaluating on that
18 project. Some -- I'm trying -- and I'm not
19 answering your question, but --

20 Q No, I think you are, but I'll move on.

21 A I mean Dino may have been engaged in
22 supporting marketing efforts. So he typically
23 worked Pennsylvania and east, I mean he worked with
24 our folks in New Jersey, and New York, on projects.
25 And you'll see those on his list. I can't speak to

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1 Q Do you recall receiving anything from any
2 of these individuals concerning the subject matter?

3 A I do not.

4 Q Is there a -- I don't recall seeing it, a
5 written policy or procedure that would guide you in
6 making such decisions?

7 A I -- so these decisions are made based on
8 workload. I don't know that there is a policy that
9 says if somebody's utilization is X percentage lower
10 than their goal, that somebody, you know, that that
11 targets, or, you know, refers over to reducing
12 somebody's hours. Because there's other things that
13 go into that decision. It's not just a numerical
14 decision. It's a -- you know, is there other work
15 in the pipeline that's coming, that we know is
16 coming. Are they involved in a significant
17 marketing effort? You know, and marketing time is
18 not part of the utilization time. It's utilization
19 is just billable hours. So, you know, it's a matter
20 of duration, too. In other words, if somebody --

21 Q So there's no written policy concerning
22 this?

23 A No, it's a judgment. It's a judgment.

24 Q How about is there any written policy
25 concerning how you did it in this case, specifically

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1 Q Okay, that answers it, thank you.

2 A Okay.

3 Q Tell me about if you had any discussions
4 with Dino himself about his utilization and issues
5 with that, prior to the reduction in hours.

6 A So Dino did not report to me, he reported
7 to Kim. And then he reported to Meredith. And they
8 did have discussions with him on multiple occasions
9 about his utilization.

10 Q And you weren't involved in that?

11 A I was involved in the discussions with
12 Meredith and with Kim, to talk about opportunities
13 to try to increase his utilization. But he reported
14 to them, not to me.

15 Q Did you give them any type of -- Kim or
16 Meredith that is, any type of instructions
17 concerning what to do with Dino?

18 A In terms of?

19 Q Utilization and repercussions involving
20 lowering hours.

21 A Did I tell them to tell Dino that if we
22 couldn't find work for him, that his hours would be
23 reduced; is that the question?

24 Q That would be one thing, yeah.

25 A I think that was implied. Not I think.

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1 produce, if anything, concerning help that Dino
2 could have gave Watson?

3 A It was the projects that Dino worked on
4 as part of our area. I mean I can go back through
5 the list, if you want. You know, Marion was one,
6 Tiffin was one.

7 Q The ones that are summarized on that
8 joint --

9 A Right. ARC Flash was another.

10 Q Just let me -- just for the record, so
11 it's clear. The ones that were summarized on the
12 summary that we did, the two page summary of
13 comparing the projects that Watson worked on
14 together with Dino?

15 A That, yeah -- that were in central,
16 southern Ohio, Tennessee, Kentucky.

17 Q So are you saying that these hours that
18 were worked on together were the product of trying
19 to get Dino more hours?

20 A Yes.

21 Q At the expense of Watson's hours?

22 A To complement Watson's hours. To either
23 do quality reviews of the work that Watson was
24 doing, which, again, is a standard practice. Any
25 work that we do, somebody reviews it. So that's a

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1 of drawings that then depict the work, the client
2 bids out to contractors.

3 Q And what point was Watson involved?

4 A Again, when we transitioned from
5 preliminary design to detailed design, is when I
6 asked Dino if he would talk to David Watson.
7 Because based on my experience, I felt that given
8 the schedule, we needed to have two electrical
9 engineers on that project.

10 So let me say one other thing on the
11 schedule. So the schedule is not just you start
12 detailed design, and you finish detailed design.
13 There's milestones with deliverables that go to the
14 client between there. So when you get to the 30
15 percent design, you submit drawings and specs to the
16 client. When you get to 60 percent, you submit
17 drawings and specs to the client. When you get to
18 90 percent, you do the same. So this -- there's
19 multiple deliverables that the client has to review
20 and approve before the design is complete.

21 Q And what you know of Dino's utilization,
22 are you really saying that he couldn't afford to put
23 in the 399.5 hours that Watson did in electrical
24 engineering to handle this project timely?

25 A So I mean if we look at the report here

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1 that summarizes the electrical engineers'
2 utilization for 2016, 2017, 2018, when the bulk of
3 the detailed design work was going on in 2016,
4 Dino's utilization was 82.7 percent. He was busy.
5 He was busy not only on Second Stage Lift, but he
6 was busy on other projects.

7 Q Okay. And that changed substantially in
8 2017?

9 A Right. When the project moved from
10 detailed -- when the Second Stage Lift Station
11 project moved from detailed design to bidding, to
12 construction, where the engineering role was
13 significantly less.

14 Q You may have answered this, too. Before
15 Watson was ever employed, who was handling -- and
16 now that I see all this work in Ohio that you talked
17 about, who was handling all these Ohio jobs?

18 A So for northeast Ohio, which was
19 principally the Mary Street Pump Station for NEORSD,
20 that I was the project manager on, Dino was the lead
21 electrical engineer on that. I brought Dino onto
22 that team to lead our electrical work. For projects
23 that were going on in the Columbus and the
24 Cincinnati area, you know, those were being done,
25 again, that was before we came together, right,

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1 those were being done by the electrical team in
2 Kentucky, in Lexington. Larry Anderson and first
3 Darryl Evans, and then when Watson came on to
4 replace Darryl Evans, Watson.

5 Q In that packet I gave you, and when you
6 looked at the personnel forms --

7 A Yes.

8 Q I'm going to refer you to Dino's
9 personnel files.

10 A Okay. I know that's in here. You did
11 not have that flagged.

12 MS. RODRIGUEZ: Is that marked as
13 something, John, like tabbed a certain way?

14 MR. ADAMCZYK: This is the front page
15 (indicating). Yes, right there.

16 A It's about -- there's several forms in
17 there.

18 MR. ADAMCZYK: It's tabbed for you.

19 MS. RODRIGUEZ: I've got it.

20 Q I'm looking at the personnel action forms
21 for Dino. And I look at them, and they only go up
22 through December 2015. There's nothing newer than
23 that that I can tell. It goes from most recent to
24 the past. And I don't see anything from December
25 2015 moving forward. I mean it's not there. Trust

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1 it was an uncomfortable situation. And I wanted him
2 to know that everything -- you know, we did
3 everything that we could before we had to do that.

4 Q And what did you tell him as far as you
5 did everything you could?

6 A Well, he knew that. I mean I told him
7 that we -- you know, and he was part of the
8 discussions that -- with Meredith at the time, that
9 we reached out to New Jersey, we reached out to New
10 York. You know, we talked to David Watson, you
11 know, looking for opportunities. It's just, you
12 know, the industrial market had dried up, and folks
13 left. I think you've seen the documentation on
14 that. So he moved into the water group. And we
15 didn't have any projects that would support him to
16 be able to keep him at 32 hours a week.

17 Q And what did he say, if anything?

18 A He nodded. You know, he acknowledged it.

19 Q At any time prior to either reduction,
20 had anyone, including yourself, or anyone you knew
21 of, approached Dino about retirement possibilities?

22 A Not to my knowledge. I have never
23 brought that up to Dino.

24 Q Did he ever bring that up to you?

25 A Not to me, no. And I'm not aware of him

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1 bringing it up to anybody else.

2 Q Are you aware of his age at the time
3 these personnel actions were taken in reducing his
4 hours?

5 A I mean I knew Dino was older than I. You
6 know, I don't know that I knew exactly what his age
7 was, but I knew he was older than I. And I was --
8 it was two years ago, yeah, I would have been 62 at
9 the time. But that was not part of the equation at
10 all. The equation was work or no work. There
11 wasn't work on the horizon to support 32 hours a
12 week, as we talked about.

13 Q Did, at the time this occurred to Dino,
14 was anyone else -- did anyone else have their hours
15 reduced?

16 A Mike Paine did. We reduced Mike Paine's
17 hours the same day from 40 to 32, again based on
18 workload.

19 Q And what type of engineer was he?

20 A Mike is a structural engineer.

21 Q Were there any other structural engineers
22 in that group?

23 A There was one other one, structural civil
24 engineer.

25 Q Who was that?

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1 do with Mr. Laskey's reduction?

2 A No. I started with HDR in 2011. And,
3 yeah, I mean I didn't assume any direct reports
4 until 2016, January of 2015 -- or, I'm sorry,
5 December of 2015, when the groups came together.

6 Q Getting back to Watson's personnel action
7 form, it says transfer. Would the rest of the group
8 that he was in out of Kentucky also have the words
9 transfer put on there? We don't have them here, but
10 do you recall?

11 A The one from December 27th, 2015 says
12 transfer.

13 Q Yeah.

14 A I would have to assume so. I haven't --
15 you know, I don't -- haven't seen those forms, but I
16 don't know why David's would be any different from
17 anybody else's.

18 Q And who else -- just give me a few names,
19 I might follow up on that, like who else would have
20 been transferred?

21 A Kyle Schwieterman,
22 S-C-H-W-I-E-T-E-R-M-A-N. Let's see, who else was
23 there at the time? Patrick Eiden, E-I-D-E-N. Aaron
24 Pummell, A-A-R-O-N, P-U-M-M-E-L-L. Lee Tourek,
25 T-O-U-R-E-K.

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1 Q That's enough. I just wanted some
2 examples that I might be able to get to see if
3 they're classified any differently as far as
4 transfer or something else.

5 MS. RODRIGUEZ: And, John, those names
6 are on the spreadsheet that we produced for all of
7 the water business group employees from 2015 through
8 2018.

9 MR. ADAMCZYK: Okay.

10 MS. RODRIGUEZ: Just so if you need them.

11 MR. ADAMCZYK: I need their -- I need
12 their transfer personnel action forms. That's what
13 I'm asking for, or whatever it says.

14 MS. RODRIGUEZ: You just want for
15 purposes of confirming whether they're categorized
16 the same?

17 MR. ADAMCZYK: Yeah. Thank you.

18 Q Did any of your discussions with fellow
19 managers, or HR, in deciding to reduce Dino's hours,
20 have anything -- did his age ever come up?

21 A No.

22 Q Did his -- anything about being near
23 retirement come up?

24 A No.

25 Q So that wasn't a factor in deciding, hey,

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1 the guy is old anyway, he should retire?

2 A No, absolutely not. Hey, you know, as
3 long as you enjoy what you're doing, keep doing it.
4 I mean I'm 64, going to be 65 next month, I'm not
5 planning on retiring. That was his personal choice.
6 And it wasn't a factor whatsoever.

7 Q Were there any -- were you aware of any
8 succession plans for Dino if he did retire, or got
9 sick or whatever?

10 A Right, well, so we have design centers,
11 we call them ASMEC, probably referenced in what we
12 sent you. It's architectural -- it stands for the
13 disciplines, architectural structural, mechanical,
14 electrical, controls. And we have ASMEC centers in
15 certain locations around the country. The one
16 that's closest to us is in Charlotte. So if Dino
17 had decided to -- you know, if he won the lottery,
18 wanted to do something else and retired, you know.
19 And this is before David Watson came on board, we
20 would go to ASMEC. And if it was after David Watson
21 came on board, and David was really busy, and Dino
22 wasn't -- you know, decided to leave us, we would go
23 to ASMEC.

24 Q So is this like a resource that you
25 didn't have to specifically plan, because you're a

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1 big company, and have people everywhere?

2 A Yeah. And we have -- there's multiple
3 ASMEC centers. And they share work amongst
4 themselves.

5 Q Concerning those centers, did you ever
6 look at -- or do you know anyone to look at whether
7 Dino could have worked out of any of those centers?

8 A So we did -- yeah, we did talk about
9 that. Not only for Dino, but for Mike and for
10 Jason, and for David. And we -- and we did talk to
11 them when we were looking for work for Dino also, on
12 multiple occasions. I think we felt that, you know,
13 it would be better for us to have those staff be
14 part of our department, part of our area. You know,
15 we could get them engaged in marketing things. They
16 would be a resource to us. You know, and there
17 would be the comfort of reporting to somebody
18 locally that they knew. So we had -- I guess we
19 had -- there was dotted line to them, from the
20 standpoint of we would always go to them and say
21 hey, you know, so-and-so is light, Dino is light,
22 Mike Paine is light, is there anything you can
23 share. That was part of our effort to reach out.
24 And Larry Anderson, too, I don't want to discount
25 that. I mentioned Larry. You know, Larry in

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1 Lexington had, still has several electrical
2 engineers as part of his group. So we would go to
3 Larry, we would go to ASMEC, we would go to other
4 client managers and project managers that Dino had
5 worked for, to -- basically reaching out to the
6 network to look for work for him.

7 Q When you say reach out, was there
8 anything formal with regard to any of the
9 individuals you mentioned, the centers, the
10 contractors, whoever, is there anything formal sent
11 out, or was it just a phone call?

12 A No, I would do both. I would send
13 emails, and I would also call.

14 Q I don't have any of those emails.

15 A And, you know, and probably because they
16 were reported to Kim and Meredith, you know, they
17 would reach out. I do know also that we had a
18 standing call with New York, New Jersey, at least
19 once a month, maybe twice a month, to talk about
20 work sharing opportunities that Kim and then
21 Meredith would participate on.

22 Q I'm pretty sure I asked for all that
23 stuff. And I didn't see any written documents about
24 reaching out to anyone, other than discussions
25 between the Pittsburgh people. Do you think they

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1 A Well, you know, there was 400 hours or so
2 of work that we were able to get him engaged in, in
3 Columbus and Cincinnati area, that we talked about.
4 He was -- we were able to get Dino much more engaged
5 in the Columbus and Cincinnati work, than we were
6 able to get Watson, who was already busy, engaged in
7 work that Dino was leading on. Other than Second
8 Stage Lift, which is what we've talked about the
9 circumstances for that already.

10 Q What work did you try to get Watson
11 involved with in the Pittsburgh area upon transfer?

12 A Well, he was -- you know, he and Dino
13 collaborated to -- you know, where Dino started
14 getting David engaged in quality reviews on a few of
15 the projects that we looked at on that combined
16 list, and then vice-versa.

17 Q Of the projects that we already went over
18 that Dino had shared with Watson in Ohio, who -- who
19 was involved in making that happen? In other words,
20 was it something that you left to Dino and Watson,
21 or was it something more structured?

22 A Well, yeah, I mean it's both, actually.
23 I mean I encouraged Dino and David Watson to work
24 together, and figure out what makes sense to balance
25 their workloads. And then when something came up

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1 like Second Stage Lift, or the ARC Flash project in
2 Columbus, I encouraged them to collaborate. I
3 encouraged Dino to get David involved in the Second
4 Stage Lift project, and I encouraged David to get
5 Dino engaged in the Columbus, ARC Flash pursuit.

6 Q So beyond that, was anything done by you
7 or anyone else to get Dino more involved and more
8 hours in Ohio work?

9 A Just through conversation. I mean, you
10 know, I don't recall if we talked about this, but
11 what clients look for is, you know, they want
12 somebody working on their project that knows their
13 facilities. You know, that David knows the Columbus
14 facilities, and that they know. And proximity, you
15 know, a client doesn't want to pay for somebody
16 from, you know, pick a place, you know, Pittsburgh
17 to go to Columbus and do work when there's somebody
18 that's qualified and available in Columbus to do
19 that work.

20 So where it made sense, you know, from a
21 project standpoint, from a client standpoint, yes, I
22 absolutely encouraged that. And, you know, I can --
23 if we look through the collective list, you know, I
24 can tell you that I got -- I asked David to get Dino
25 engaged in the Marion project, to at least do

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1 reviews, and the Tiffin project, both for Aqua Ohio.

2 Q Is there any specific Ohio projects that
3 you were trying to get to Dino himself?

4 A Well, as we talked about, I mean there
5 was the Mary Street project that I selected Dino. I
6 named Dino in the proposal, and I used Dino as my
7 lead electrical engineer on that project, which was
8 done in 2014, before we came together, before David
9 Watson joined. And I selected Dino and put him in
10 the organizational chart for the Second Stage Lift
11 project.

12 Q Other than that?

13 A ARC Flash we talked about. Marion and
14 Tiffin we talked about for Aqua Ohio.

15 Q I noticed that Watson was making a lot
16 less than Dino. Do you agree with that?

17 A Yes.

18 Q Was that involved in the decision to
19 provide Dino less work?

20 A No, not at all. Dino had significantly
21 more experience than David Watson did.

22 Q When you had the meeting between Crall
23 and the others, and the HR rep, was Dino's age
24 brought up at all?

25 A No.

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1 A I am not aware of that, no.

2 Q Do you know if part of that process would
3 have involved that analysis?

4 A I do not know. I don't -- to my
5 knowledge, that did not happen.

6 Q Did you make that analysis independently?

7 A As to whether age discrimination played
8 into the decision?

9 Q Yes.

10 A Is that the question? No. In my mind,
11 you know, the decision had nothing to do with age.
12 It had everything to do with just the availability
13 of work.

14 Q Your Answers to Interrogatories, I asked
15 not you -- well, I'll give you a copy.

16 A I think I have one.

17 MS. RODRIGUEZ: And I'd like to place an
18 objection on the record. For the record, there
19 wasn't a topic notice for this corporate
20 representative that said anything about being
21 prepared to discuss the specifics of HDR's discovery
22 responses. To the extent it relates to Attachment A
23 through D, obviously the witness can testify based
24 on his preparation. To the extent it relates to
25 something outside of that, I will allow the witness

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1 A No.

2 Q So how are you sure that Randy Gilbert
3 was involved?

4 A Because I talked to him.

5 Q What did -- what went on about the
6 vacating of the office that Dino had? Did you tell
7 Dino anything about he had to vacate his office?

8 A So as part of the discussion where we
9 talked to him about reducing his hours, we also let
10 him know that, two things, number one is an office
11 space was at a premium at that time in the -- at our
12 location. That, you know, we -- because he was
13 moving to PT 20, that, you know, that didn't merit
14 an office anymore. And that, you know, we were
15 going to relocate him to a project manager office,
16 which is an office -- or cubicle, I should say,
17 project management cubicle next to the window. And
18 we offered to move his things for him so he didn't
19 have to do it.

20 Q And what did he say?

21 A He didn't say anything.

22 Q Did you tell him when you were going to
23 move his things?

24 A I think we told him that we needed to
25 move them -- So we talked to Dino, I believe it was